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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMY COHEN, KATHARINE
VACCARELLA, and SIRISH KONERU on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

CBR SYSTEMS, INC., GI PARTNERS, and
DOES 1-10,

Defendants.

Case No. 4:21-CV-06527-HSG

**STIPULATION AND ORDER
EXTENDING DEADLINES
AND SETTING BRIEFING
SCHEDULE REGARDING
DEFENDANTS' MOTIONS TO
COMPEL ARBITRATION**

Hon. Haywood S. Gilliam, Jr.

STIPULATION AND ORDER EXTENDING DEADLINES AND SETTING BRIEFING SCHEDULE
REGARDING DEFENDANTS' MOTIONS TO COMPEL ARBITRATION

Pursuant to Local Rule 6-2, Plaintiffs Amy Cohen, Katharine Vaccarella, and Sirisha Koneru (collectively, “Plaintiffs”), and Defendants CBR Systems, Inc. (“CBR”) and GI Partners (“GI”); and together with CBR, “Defendants”), through their attorneys of record, hereby agree and stipulate as follows:

WHEREAS, Plaintiffs filed a Second Amended Complaint (“SAC”) on November 10, 2021, with the consent of Defendants (ECF No. 38);

WHEREAS, on November 19, 2021, Defendant CBR filed its Motion to Compel Arbitration or In the Alternative to Dismiss under Rule 12(b)(6) (“CBR’s Motion to Compel Arbitration”) (ECF No. 46);

WHEREAS, Defendant GI’s response to the SAC is due on December 10, 2021, and Defendant GI intends to file on December 10, 2021, a Motion to Compel Arbitration or In the Alternative to Dismiss under Rule 12(b)(6) which will join in part Defendant CBR’s Motion to Compel Arbitration (“GI’s Motion to Compel Arbitration”);

WHEREAS, pursuant to Local Rule 7-3, Plaintiffs’ response to Defendant CBR’s Motion to Compel Arbitration is currently due on December 3, 2021, and Plaintiffs’ Response to Defendant GI’s Motion to Compel Arbitration will be due on December 27, 2021;

WHEREAS, the parties have met and conferred and anticipate that the arguments in Defendant CBR’s Motion to Compel Arbitration and Defendant GI’s Motion to Compel Arbitration will include some overlapping factual and legal arguments;

WHEREAS, in consideration of these overlapping factual and legal arguments, and in the interest of judicial resources, and in conserving the parties’ resources, the parties have met and conferred and have agreed to the below briefing schedule, which accommodates numerous conflicts among counsel for all parties, as well as holidays and personal obligations;

WHEREAS, the hearing on Defendants’ Motion to Compel Arbitration or In the Alternative to Dismiss under Rule 12(b)(6) is currently set for March 31, 2022, and therefore the proposed briefing schedule will not impact that hearing date and all papers will be filed nearly five weeks prior to the hearing;

WHEREAS, pursuant to this Honorable Court's Standing Order, the parties intend to submit a joint letter regarding their discovery dispute relating to Plaintiffs' request for pre-arbitration discovery to determine the validity and enforceability of the arbitration agreement, and have agreed to file their joint letter stating the nature and status of their dispute on December 15, 2021;

WHEREAS, accordingly, Plaintiffs and Defendants agree to the following case schedule:

Event	Deadline
Parties to Submit Joint Letter to Court Regarding Pre-Arbitration Discovery Dispute	December 15, 2021
Plaintiffs' Opposition to Defendants' Motions to Compel Arbitration	January 14, 2022
Defendants' Replies in Support of Motions to Compel Arbitration	February 25, 2022

IT IS SO STIPULATED.

Dated: November 24, 2021

Respectfully submitted,

MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN, PLLC

By: /s/ Rachel L. Soffin
RACHEL L. SOFFIN

Attorneys for Plaintiffs

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Dianne L. Sweeney
DIANNE L. SWEENEY

Attorneys for Defendant CBR SYSTEMS, INC.

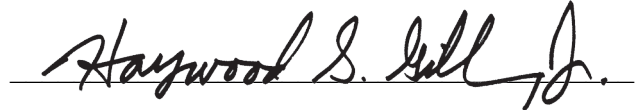
MILLER BARONDESS, LLP

By: /s/ Casey B. Sypek
CASEY B. SYPEK

Attorneys for Defendant GI PARTNERS

ORDER

PURSUANT TO STIPULATION, IT SO ORDERED THIS 24th day of November, 2021.

A handwritten signature in black ink, reading "Haywood S. Gilliam, Jr.", is written over a horizontal line.

THE HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Court Judge